



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality Permit

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to and in effect under that Act,

Facility Name: Southern Graphic Systems, LLC.
Facility Address: 3045 Chastain Meadows Parkway, Suite 200
Marietta, Georgia 30066 Cobb County
Mailing Address: 7435 Empire Drive
Florence, Kentucky 41042
Facility AIRS Number: 04-13-067-00252

is issued a Permit for the following:

Construction and operation of two flexographic plate making lines and continued operation of a printing plate manufacturing facility. This Permit is issued for the purpose of establishing practically enforceable emission limitations such that the facility will not be considered a major source with respect to Title V of the Clean Air Act Amendments of 1990.

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 26959 dated February 20, 2019; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 6 pages.



DRAFT

Richard E. Dunn, Director
Environmental Protection Division

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1. General Requirements

- 1.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate this source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection or surveillance of the source.
- 1.2 The Permittee shall not build, erect, install or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged into the atmosphere.
- 1.3 The Permittee shall submit a Georgia Air Quality Permit application to the Division prior to the commencement of any modification, as defined in 391-3-1-.01(pp), which may result in air pollution and which is not exempt under 391-3-1-.03(6). Such application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. The application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity and pollutant emission rates of the plant before and after the change, and the anticipated completion date of the change.
- 1.4 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.
- 1.5 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.

2. Allowable Emissions

- 2.1 The Permittee shall not cause, let, suffer, permit or allow emissions from the facility, which contain volatile organic compounds (VOC) in an amount equal to or exceeding 100 tons during any twelve consecutive months.
[391-3-1-.03(8)(c)14.(i) Avoidance and Title V Avoidance]
- 2.2 The Permittee shall not cause, let, suffer, permit or allow emissions from the facility, which contain any single hazardous air pollutant (HAP) in an amount equal to or exceeding 10.0 tons during any twelve consecutive month period, or any combination of such listed HAPs in an amount equal to or exceeding 25.0 tons during any twelve consecutive month period.
[Title V Avoidance]

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2.3 The Permittee shall not cause, let, suffer, permit, or allow emissions from any processes at this facility the opacity of which is equal to or greater than forty (40) percent.
[391-3-1-.02(2)(b)1.]

2.4 The Permittee shall not cause, let, suffer, permit, or allow the rate of emission of particulate matter in total quantities from any processes at this facility to equal or exceed the allowable rate calculated as follows:
[391-3-1-.02(2)(e)1(i)]

a. For process input weight rate up to and including 30 tons/hr:
 $E = 4.1P^{0.67}$; or

b. For process input weight rate above 30 tons/hr:
 $E = 55P^{0.11} - 40$

Where:

E = allowable PM emission rate in pounds per hour

P = total dry process input weight rate in tons per hour.

2.5 The Permittee shall, pursuant to the Division-approved VOC reasonably available control technology (RACT) plan dated February 20, 2019, employ the following RACT for the operation of any processes at this facility:
[391-3-1-.02(2)(tt)1.]

a. Keeping all VOC material containers closed while not in use.

b. Prompt cleanup of spills.

c. Prompt repair of drips.

d. Storage of VOC-laden cleaning rags in closed containers.

e. Manage washout time and temperature.

f. Transfer thick plate work to Liquid Photopolymer Lines where possible (which will result in a reduction in VOC emissions).

g. Manage solvent quality that is produced in the distillation units.

h. The Permittee shall conduct an inspection once per week of operation to ensure compliance with the requirements specified in Paragraphs a. through g. The Permittee shall correct any adverse condition, discovered by the inspection, in the most expedient manner possible and note the corrective action taken. If not immediately correctable, the Permittee shall implement a corrective action plan within 24 hours after an adverse

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condition has discovered during inspections per Paragraphs b. through f. A record of the adverse condition and the corrective action(s) taken shall be kept.

3. Fugitive Emissions

- 3.1 The Permittee shall take all reasonable precautions with any operation, process, handling, transportation, or storage facilities to prevent fugitive emissions of air contaminants.

4. Process & Control Equipment

- 4.1 Routine maintenance shall be performed on all air pollution control equipment. The Permittee shall record and maintain records of routine maintenance in a form suitable for inspection or submittal to the Division.

5. Monitoring

- 5.1 Any monitoring system or device installed by the Permittee shall be in continuous operation except during calibration checks, zero and span adjustments or periods of repair. Maintenance or repair shall be conducted in the most expedient manner to minimize the period during which the system is out of service.
[391-3-1-.02(6)(b)1.]

6. Performance Testing

- 6.1 The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Division. The following provisions shall apply with regard to such tests:
- a. All tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants.
 - b. All test results shall be submitted to the Division within sixty (60) days of the completion of testing.
 - c. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.
 - d. All monitoring systems and/or monitoring devices required by the Division shall be installed, calibrated and operational prior to conducting any performance test(s). For any performance test, the Permittee shall, using the monitoring systems and/or monitoring devices, acquire data during each performance test run. All monitoring system and/or monitoring device data acquired during the performance testing shall be submitted with the performance test results.

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7. Notification, Reporting and Record Keeping Requirements

7.1 The Permittee shall maintain monthly usage records of all materials utilized at the entire facility containing VOC. These records shall include the total weight of each material used and the VOC content of each material (expressed as a weight percentage). The Permittee may subtract from the monthly usage records of any material disposed as waste provided that the total weight, VOC content (expressed as a weight percentage), and documentation of the method for determining the VOC content of any such waste material be included as part of the record. All other calculations used to determine usages should also be kept as part of the monthly record.
[391-3-1-.02(6)(b)1(i)]

7.2 The Permittee shall use the monthly records required in Condition 7.1 to calculate the facility-wide VOC emissions during each calendar month. All variables used in the calculation, including any Division-approved emission factors, control efficiencies, or coating transfer efficiencies, shall be kept as part of the monthly records.
[391-3-1-.02(6)(b)1(i)]

The Permittee shall notify the Division in writing if the facility-wide VOC emissions exceed 8.33 tons during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the emission limitation in Condition No. 2.1.

7.3 The Permittee shall use the calculations required by Condition 7.2 to determine the 12-month rolling total of VOC emissions from the entire facility. The Permittee shall notify the Division in writing if the total VOC emissions equal or exceed 100 tons during any twelve consecutive months. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain future compliance with the emission limit in Condition 2.1.
[391-3-1-.02(6)(b)1(i)]

7.4 The Permittee shall maintain monthly usage records of all materials utilized at the entire facility containing one or more listed hazardous air pollutants (HAP). These records shall include the total weight of each material used and the amount of each listed HAP contained in each material (expressed as a weight percentage). The Permittee may subtract from the monthly usage the individual HAP content of any material disposed as waste provided that the total weight, the individual HAP content (expressed as a weight percentage), and documentation of the method for determining the individual HAP content of any such waste material be included as part of the record. All other calculations used to determine usages should also be kept as part of the monthly record.
[391-3-1-.02(6)(b)1(i)]

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- 7.5 The Permittee shall use the monthly usage records required in Condition 7.4 to calculate total monthly emissions of each listed hazardous air pollutant emitted from the entire facility. All variables used in the calculations, including any Division-approved emission factors, control efficiencies or coating transfer efficiencies, shall be kept as part of the monthly records.
[391-3-1-.02(6)(b)1(i)]

The Permittee shall notify the Division in writing if the emissions of any individual hazardous air pollutant exceed 0.83 tons, or if emissions of all listed hazardous air pollutants combined exceed 2.08 tons, during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the emission limit in Condition 2.2.

- 7.6 The Permittee shall use the calculations required by Condition 7.5 to determine the 12-month rolling total of single/combined HAP emissions from the entire facility. The Permittee shall notify the Division in writing if, during any twelve consecutive month period, the emissions of any individual hazardous air pollutant equal or exceed 10.0 tons, or if the emissions of all listed hazardous air pollutants combined equal or exceed 25.0 tons. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain future compliance with the emission limit in Condition 2.2.
[391-3-1-.02(6)(b)1(i)]

- 7.7 The Permittee shall furnish the Division written notification as follows:
[391-3-1-.02(6)(b)1(i)]

- a. The actual dates of initial startup of the new plate processors (ID Nos. PPD2 and PPD6), within 15 days after such dates.
- b. Certification that a final inspection has shown that construction has been completed in accordance with the application, plans, specifications, and supporting documents submitted in support of the Permit within 60 days after the initial startup.

8. Special Conditions

- 8.1 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the rules adopted pursuant to that Act.
- 8.2 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of the fee shall be determined each year in accordance with the "Procedures for Calculating Air Permit Fees."

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- 8.3 All Georgia Air Quality Permits previously issued to Southern Graphic Systems, LLC., including the following permit and amendment, are hereby revoked in their entirety.

Table 1: Previous Permit/Amendment That Are Revoked by This Permit	
Permit No.	Date of Issuance/ Effectiveness
3555-067-0252-S-01-0	January 19, 2012
3555-067-0252-S-01-1	April 21, 2016
3555-067-0252-S-01-2	August 2, 2018